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12 U.S. Bank National Association,
As Trustee For MASTR Asset Backed
Securities Trust 2006-WMC4, Mortgage
Pass-Through Certificates, Series 2006-WMC4

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

13 U.S. BANK NATIONAL ASSOCIATION,
14 AS TRUSTEE FOR MASTR ASSET
15 BACKED SECURITIES TRUST 2006-
16 WMC4, MORTGAGE PASS-THROUGH
17 CERTIFICATES, SERIES 2006-WMC4,

18 Plaintiff,
19 v.

20 ER HOLDINGS NV LLC, a Nevada limited
liability company; VILLA DEL ORO
21 OWNERS ASSOCIATION, a Nevada non-
profit corporation; LIDIA BOLOY
HERRERA, an individual,

22 Defendants.

Case No.: 2:17-cv-02129-JAD-GWF

**STIPULATION AND [PROPOSED]
ORDER TO STAY LITIGATION AND
DISCOVERY PENDING
COMPLETION OF SETTLEMENT**

23 Pursuant to Local Rules LR IA 6-2 and LR 7-1, Plaintiff U.S. Bank National
24 Association, as Trustee For MASTR Asset Backed Securities Trust 2006-WMC4, Mortgage
25 Pass-Through Certificates, Series 2006-WMC4 ("U.S. Bank"), and Defendants ER Holdings
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1 NV LLC (“ER Holdings”) and Villa Del Oro Owners Association (the “HOA”) (collectively,
2 the “Parties”),¹ by and through their respective undersigned counsel, stipulate as follows:

- 3 1. The instant action was filed on August 8, 2017. [ECF No. 1.]
4 2. ER Holdings and the HOA filed a joint answer to the Complaint on October 2,
5 2017. [ECF No. 9.]

6 3. On November 20, 2017, the Court entered a Discovery Plan and Scheduling
7 Order in this matter, which order set the deadline to complete discovery in this case for April
8 2, 2018. [ECF No. 11.] Around the same time, U.S. Bank and ER Holdings commenced
9 settlement discussions which have been ongoing throughout this action. Accordingly, on
10 February 28, 2018, the Court entered a Stipulation and Order Extending Discovery Deadlines
11 (First Request), which extended the discovery deadline in this matter to July 2, 2018. [ECF No.
12 14.]

13 4. On June 11, 2018, U.S. Bank and ER Holdings came to an agreement with
14 respect to this matter, and are in the process of finalizing their settlement.

15 5. Additionally, U.S. Bank and the HOA are discussing a possible resolution of
16 this matter.

17 6. Given the pending settlement between U.S. Bank and ER Holdings, and the
18 settlement discussions between U.S. Bank and the HOA, and to avoid wasting resources and
19 incurring potentially unnecessary expense associated with completing discovery, the Parties
20 agree to, and hereby request, a stay of this case to give U.S. Bank and ER Holdings sufficient
21 time and resources to finalize their settlement, as well as to give U.S. Bank and the HOA time
22 to attempt to reach a resolution as well.

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28 ¹ Defendant Lidia Boloy Herrera has not appeared in this action.

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2 7. The Parties make this stipulation in good faith and not for purposes of delay.
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Dated this 19th day of June, 2018.	Dated this 19th day of June, 2018.
SMITH LARSEN & WIXOM	HOA LAWYERS GROUP, LLC
<u>/s/Katie M. Weber</u>	<u>/s/Steven T. Loizzi</u>
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Attorneys for Plaintiff	Owners Association
U.S. Bank National Association, As Trustee For MASTR Asset Backed Securities Trust 2006-WMC4, Mortgage Pass-Through Certificates, Series 2006-WMC4	

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14 **IT IS SO ORDERED:**
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17 UNITED STATES MAGISTRATE JUDGE
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DATED: 6/21/2018